

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE**

“BARBARA;” “SARAH,” by guardian, parent,  
and next friend “SUSAN;” and “MATTHEW,”  
by guardian, parent, and next friend “MARK;”  
on behalf of themselves and all those similarly  
situated,

*Plaintiffs,*

v.

DONALD J. TRUMP, President of the United  
States, in his official capacity, et al.,

*Defendants.*

Case No. 1:25-cv-244-JL-AJ

**ASSENTED-TO MOTION FOR ADMISSION *PRO HAC VICE*  
MORGAN ELLE HUMPHREY**

1. Pursuant to Rule 83.2(b) of the Local Rules of the United States District Court for the District of New Hampshire, Plaintiffs respectfully move this court for an order admitting Ms. Morgan Elle Humphrey to the bar of this Court, *pro hac vice*, for the purpose of representing Plaintiffs in the above-captioned case. Ms. Humphrey is knowledgeable regarding the dispute between the parties, and it would be economical and efficient to allow Ms. Humphrey to appear before this Court.

2. Ms. Humphrey is a member in good standing of the bar of New Jersey State; she is not suspended or disbarred in any jurisdiction or involved in any disciplinary proceedings; and she has never had *pro hac vice* status denied or revoked by any court. An affidavit attesting to these facts is attached.

3. For the foregoing reasons, Plaintiffs respectfully request that this Court grant this motion and enter an order for admission of Ms. Humphrey *pro hac vice* in the above-captioned case.

4. Defendants, through counsel, assent to this motion.

WHEREFORE, Plaintiffs respectfully request that this Honorable Court:

- A. Grant this Motion for Admission *Pro Hac Vice* of; and
- B. Grant such other and further relief as may be just and equitable.

Date: June 28, 2025

Respectfully submitted,

/s/ SangYeob Kim

SangYeob Kim (N.H. Bar No. 266657)

Gilles R. Bissonnette (N.H. Bar No. 265393)

Henry R. Klementowicz (N.H. Bar. No. 21177)

Chelsea Eddy (N.H. Bar No. 276248)

AMERICAN CIVIL LIBERTIES UNION OF NEW  
HAMPSHIRE FOUNDATION

18 Low Avenue

Concord, NH 03301

(603) 224-5591

sangyeob@aclu-nh.org

gilles@aclu-nh.org

henry@aclu-nh.org

chelsea@aclu-nh.org

*Counsel for Plaintiffs*